

March 7, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554



Re: Request for Special Temporary Authority to Drift
and Operate Intelsat 702
Call Sign S2388

Dear Ms. Dortch:

Intelsat License LLC (f/k/a Intelsat North America LLC) ("Intelsat") herein requests Special Temporary Authority ("STA")¹ for 30 days beginning April 14, 2011 to drift Intelsat 702 (call sign S2388) from 66.0° E.L. to 54.85° E.L. and begin operating at 54.85° E.L. in the C- and Ku-bands pursuant to the ITU filings of the Indian Administration.² At 54.85° E.L., Intelsat 702 will replace Intelsat 709, which Intelsat plans to redeploy to 72.10° E.L.³

Intelsat 702 currently is licensed to operate at 66.0° E.L.⁴ Intelsat expects Intelsat 702 to be on-station at 54.85° E.L. in mid-May and to operate the satellite there for approximately three months, after which it will be relocated. Following traffic transfer from Intelsat 709 to Intelsat 702, Intelsat 709 will be relocated to 72.10° E.L. as noted above.

During the drift of Intelsat 702 from 66.0° E.L. to 54.85° E.L., Intelsat will utilize only the satellite's TT&C frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process.

¹ Intelsat has filed this STA request, an FCC Form 159 and a \$830.00 filing fee electronically via the International Bureau's Filing System.

² Intelsat's recent extension of its agreement with the Indian Administration allows Intelsat to operate a satellite at 54.85° E.L. through March 31, 2011. That extension was attached to a previously-filed STA request (*see* File No. SAT-STA-20101207-00256) and is incorporated herein by reference. Intelsat fully expects that the Indian Administration will extend the agreement.

³ *See Intelsat License LLC Request for Special Temporary Authority*, File No. SAT-STA-20110107-00006 (filed Jan. 7, 2011).

⁴ *See Policy Branch Information; Actions Taken*, Report No. SAT-00595, File No. SAT-MOD-20081217-00233 (Apr. 10, 2009) (Public Notice).

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The specific TT&C frequencies are as follows:

Uplink:

6173.7 MHz and 6176.3 MHz (LHCP)

Downlink:

3947.5 MHz and 3948.0 MHz (RHCP)

3952.5 MHz and 3952.0 MHz (RHCP)

Once on-location at 54.85° E.L., Intelsat will operate the following communications payload frequencies on Intelsat 702:

Uplink:

5925-6425 MHz

14.0-14.5 GHz

Downlink:

3700-4200 MHz

10.95-11.2 GHz

11.45-11.7 GHz

12.5-12.75 GHz⁵

Intelsat requests that the Part 25 waivers originally granted to the Intelsat 702 spacecraft continue to apply at the 54.85° E.L. location, namely, the waivers of Sections 25.202(g), 25.210(a)(1), 25.210(a)(3), 25.210(c), 25.210(i) and 25.211 (a) of the Commission's rules.⁶

⁵ Although Intelsat 702 also has the capability to transmit in the frequency band 11.7-11.95 GHz, Intelsat does not intend to utilize this frequency band from the 54.85° E.L. orbital location.

⁶ See *Applications of Intelsat LLC for Authority to Operate and Further Construct, Launch, and Operate C-Band and Ku-Band Satellites that Form a Global Communications System in Geostationary Orbit*, 15 FCC Rcd 15460, 15529 (Appendix C) (2000) (Memorandum Opinion and Order and Authorization), *recon. denied*, 15 FCC Rcd 25234 (2000) (Order on Reconsideration).

Grant of this STA request is in the public interest because it will allow Intelsat to ensure continuity of service to customers in the Indian Ocean region for a few more months. Intelsat will ensure that any of its customers at 54.85° E.L. whose contracts have not terminated are moved to other satellites before Intelsat 702 leaves the location.

Grant of this STA request will not result in increased risk of harmful interference. As noted above, Intelsat will operate only the above listed TT&C frequencies during the drift, and will coordinate its TT&C transmissions with operators of satellites in the drift path. Should any interference occur during the drift, Intelsat will take all reasonable steps to eliminate such interference. Once on-station at 54.85° E.L., Intelsat will operate the communications payload in conformance with the Indian Administration's coordination agreements related to the nominal 55.0° E.L. location. Intelsat also agrees to operate Intelsat 702 at 54.85° E.L. consistent with the conditions previously imposed on Intelsat's operation of Intelsat 709 at this same orbital location.⁷

Intelsat has assessed and limited the probability of the space station becoming a source of debris as a result of collision with large debris or other operational space stations. Except for Intelsat 709, Intelsat 702 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. Further, Intelsat is not aware of any other FCC licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with Intelsat 702 at 54.85° E.L. Finally, Intelsat is not aware of any system with an overlapping station-keeping volume with Intelsat 702 at 54.85° E.L. that is the subject of an ITU filing and that is either in orbit or progressing towards launch.

⁷ See *Policy Branch Information; Actions Taken*, Report No. SAT-00730, File No. SAT-STA-20101006-00209 (Oct. 22, 2010) (Public Notice).

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For the reasons set forth herein, Intelsat respectfully requests that the Commission expeditiously grant this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan H. Crandall". The signature is fluid and cursive, with a large initial "S" and a long horizontal stroke at the end.

Susan H. Crandall
Assistant General Counsel
Intelsat Corporation

cc: Karl Kensinger
Kathryn Medley
Stephen Duall